

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

INT'L FRESH PRODUCE ASS'N,
ET AL.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
LABOR, *ET AL.*,

Defendants.

Civil Action No. 1:24-cv-00309

**CONSENT MOTION FOR LEAVE TO FILE
BRIEF OF THE AFL-CIO AS *AMICUS CURIAE*
IN SUPPORT OF DEFENANTS' OPPOSITION TO PLAINTIFFS'
MOTION FOR A STAY AND A PRELIMINARY INJUNCTION**

The American Federation of Labor & Congress of Labor Organizations ("AFL-CIO") hereby moves for leave to file a brief as amicus curiae in support of Defendants opposition to Plaintiffs' and Intervenor State Plaintiffs' Motions for a Preliminary Injunction and Stay.

All parties have consented to this Motion.

The AFL-CIO is a federation of 60 national and international labor organizations with a total membership of over 12.5 million working men and women. For almost 90 years since the passage of the National Labor Relations Act ("NLRA") of 1935, the AFL-CIO and AFL-CIO-affiliated unions have litigated cases

under the NLRA before the National Labor Relations Board (“NLRB”), the lower federal courts, and the Supreme Court. Given the AFL-CIO’s history and vast experience with the NLRA, the AFL-CIO seeks to file a brief as amicus curiae centrally to explain why the NLRA in no way precludes the Department of Labor’s effort to protect U.S. workers by adopting the rule at issue in this case, Dep’t of Labor, “Improving Protections for Workers in Temporary Agricultural Employment in the United States,” 89 Fed. Reg. 33,898 (Apr. 29, 2024).

Dated: November 8, 2024

Respectfully submitted,
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